

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

STATE OF MISSOURI ex rel. ERIC S.
SCHMITT, Attorney General, *et al.*;

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official capacity as
President of the United States, *et al.*;

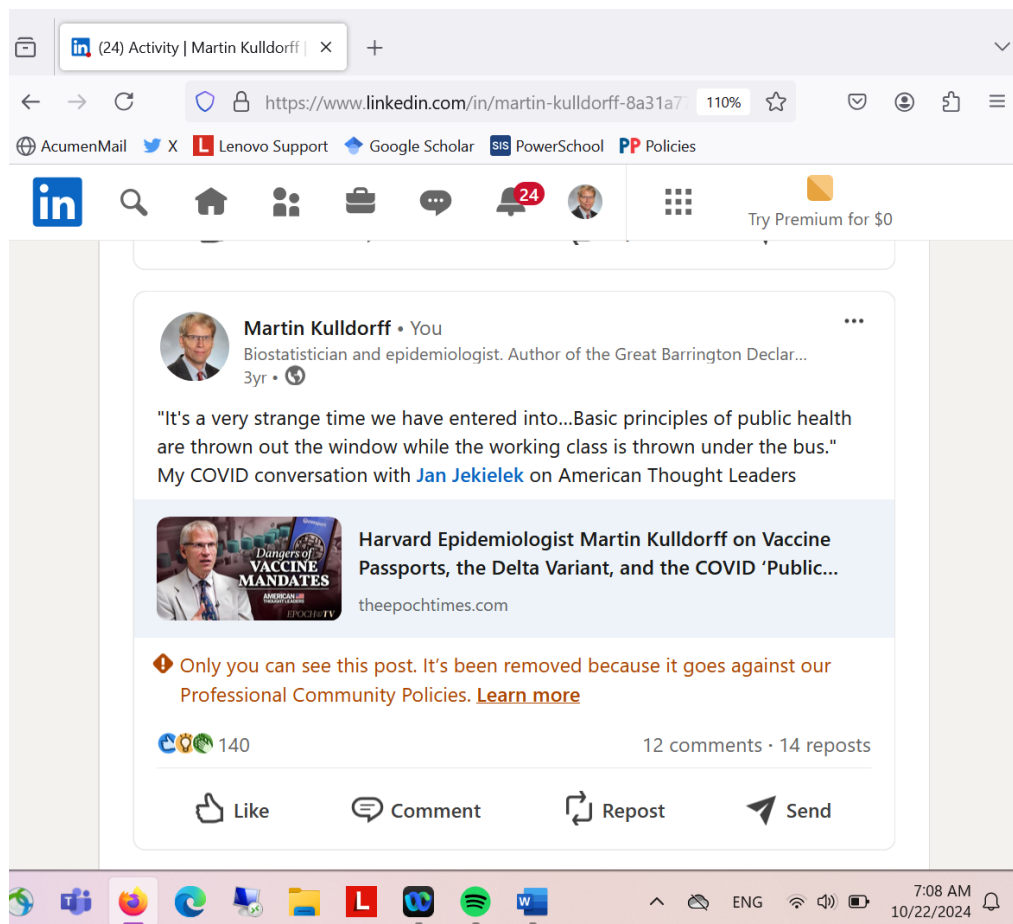
Defendants.

Case No. 3:22-cv-01213

SUPPLEMENTAL DECLARATION OF DR. MARTIN KULLDORFF

I, Dr. Martin Kulldorff, declare as follows:

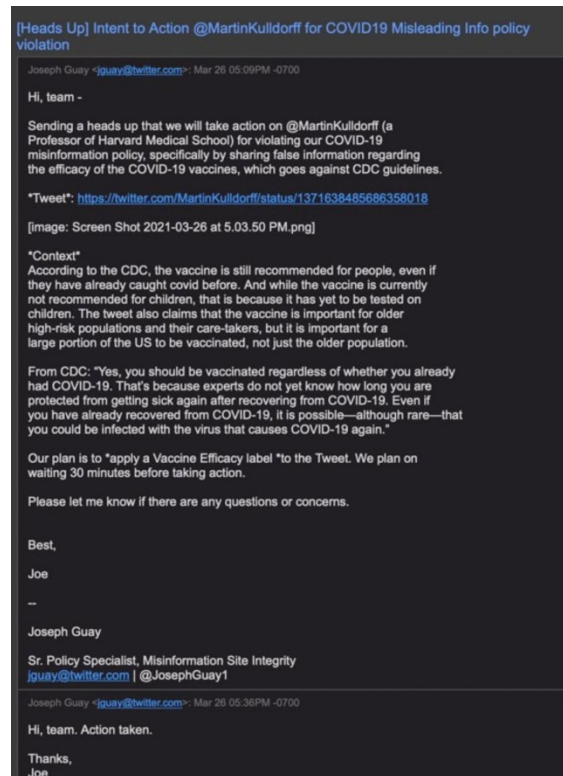
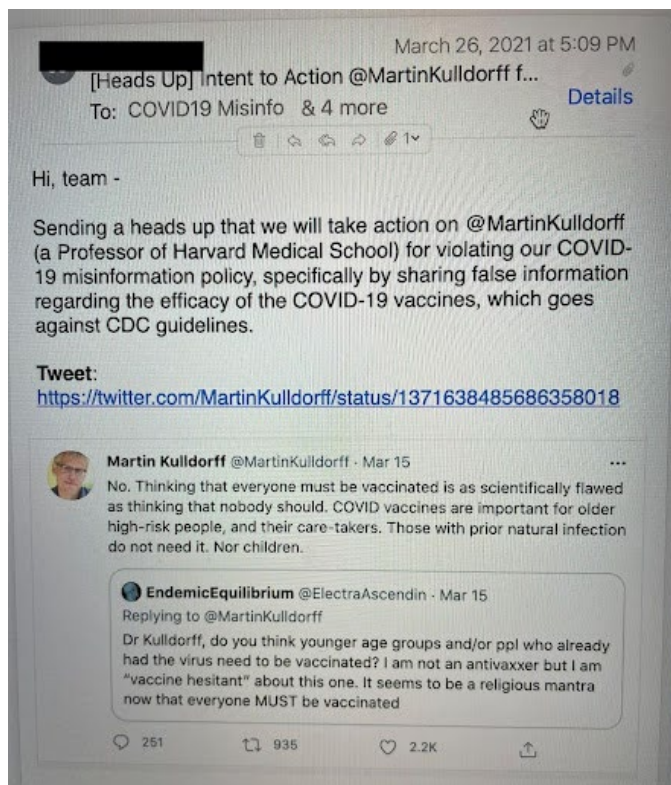
1. I am an adult of sound mind and make this statement voluntarily, based upon my knowledge, education, and experience.
2. I make this declaration to supplement statements made on June 8, 2022, in my initial declaration, ECF 45-4.
3. As stated in my initial Declaration, I was censored by multiple social media platforms when communicating accurate and important public health information. This included LinkedIn, Facebook, YouTube, Twitter and Google. Some of those posts are still censored to this date. For example, in 2021, I wrote on LinkedIn that *'Basic principles of public health are thrown out the window while the working class is thrown under the bus.'* with a link to an interview on this topic. As seen in the screenshot below from October 2024, this LinkedIn post is still being censored with a note that, *"Only you can see this post. It's been removed because it goes against our Professional Community Policies."* Hence, the censorship outlined in my initial Declaration has not ended.



4. Social media has continued to censor me for material created after my prior Declaration in 2022. For example, in April, 2024, I was interviewed by RocaNews journalist Maximillian Towney, providing accurate scientific information based on the fundamental principles of public health. When the interview was posted on TikTok, where he has 725 thousand followers, the interview was banned, and the account of Mr. Towney was given a “warning.”

5. The initial discovery in this case was general in nature, showing that the federal government engaged with social media companies to censor public health information. There has, yet, not been any discovery regarding the many specific instances when I was censored. Without such discovery, it is impossible to know exactly why I was censored, who executed the censorship, on whose behalf I was censored, and the nature of internal and external pressures and demands for censoring accurate public health information.

6. The one exception, where we do know something, comes not from the discovery process but through journalistic digging and efforts.¹ In March 2021, Twitter censored a post when I wrote that *“Thinking that everyone must be vaccinated is as scientifically flawed as thinking that nobody should. COVID vaccines are important for older high-risk people and their caretakers. Those with prior natural infection do not need it. Nor children.”* Twitter falsely claimed that the tweet was misleading, making it so that it could not be replied to, shared or liked. The immediate censor was Joseph Guay, who took the action *‘for violating our Covid-19 misinformation policy’*, stating that it *‘goes against CDC guidelines’*. Furthermore, we know that the post was censored at the direct request of the government initiated and funded Virality Project at Stanford University with the following reviewer note: *‘Censoring Kulldorff: this Tweet directly contradicts CDC advice’* (see three figures below).



¹ Gutenberg A, Lowenthal A. [Stanford Group Helped US Government Censor Covid Dissidents and Then Lied About It](#), Public News, November 10, 2023.



Here's the latest version of this record from the "Virality" table:

Summary

Claim that those who previously had covid or who are children don't need vaccine

[REVIEWER TAG]

Gold

[REVIEWER NOTES]

Censoring Kulldorf: "this Tweet directly contradicts CDC's advice."

Resolution

Communicated

Description

[REDACTED]

|

Custom field (Content Data)

Custom field (Content URLs)

<https://twitter.com/MartinKulldorff/status/1371638485686358018?s=20>

Custom field (Fact Checking or Other URLs)

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/faq.html>

Comment

[REDACTED]

Comment 2

[REDACTED]

Comment 3

18/Mar/21 6:06 PM/70121f5ae1196-bb6a-41ac-acc5-277a3a93a73f/Dear Twitter Team, This Tweet directly contradicts CDC's advice. <https://twitter.com/MartinKulldorff/status/1371638485686358018?s=20><https://twitter.com/MartinKulldorff/status/1371638485686358018?s=20>([smart-link](https://twitter.com/MartinKulldorff/status/1371638485686358018?s=20)) Thanks, [REDACTED]

Comment 4

26/Mar/21 5:00 PM/qm4bae4b10-6ffb-4a71-aa69-5d5e8a88163e1091ad54-bdc9-43cd-98a4-0215efc280d5/Thanks team - we're looking into this. - Joe

Comment 5

Comment 6

7. Since the above knowledge was obtained through journalism rather than through the court ordered discovery process, we know that the general discovery process to date did not unearth all relevant information about the instances when my co-plaintiffs and I were censored. More focused discovery is required to determine the precise nature, interactions, and people involved in the many instances in which we were censored, as well as in the development of the policies and procedures that were used to censor us, and the role that the government played in developing those policies

8. None of the social media companies, nor the government, have issued an apology for censoring me. None of them have issued an assurance that I will no longer be censored. On the contrary, censored posts are still censored. Hence, after instances of temporary suspensions and warnings, I am forced to continue to censor myself to avoid permanent suspension from the platforms. To my knowledge, the federal government has never urged social media companies to stop censoring me and other scientists, which they should do if they care about public health and the open

exchange of scientific ideas. Censorship inevitably leads to self-censoring. Some of my public health colleagues did not speak up for fear of being censored, like I was. I don't blame them.

9. As part of the discovery process, social media companies released information about how they censored misinformation and disinformation. While they also censored true public health information by me and my co-plaintiffs, they did not release information about the times when we were censored. This is convenient for them, as they can then frame the issue as combatting disinformation even though true information was also censored. While the First Amendment also protects false speech, such as claims that the earth is flat or the denial of infection acquired immunity, it is easier to argue for censoring disinformation than true information. It is also convenient, albeit disingenuous, to try to lump us together with people who did spread disinformation.

10. During the pandemic, I was primarily censored on three topics: school closures, vaccines and masks. All three are examples where censoring was harmful and deadly.

11. In the spring of 2020, Sweden was the only major country that kept schools open for all their 1.8 million children ages 1 and 15, with zero Covid deaths among children and no excess Covid infection among teachers compared to the average of other professions. Hence, by the summer of 2020 we knew that it was safe to open schools, but such information was banned when I and others spoke out. The results are now in. There are measurable long term detrimental effects on both educational test results, and on the social and mental health of millions of American children, including the children of the plaintiffs and attorneys in this case. Almost nobody is still defending those 2020 and 2021 school closures.

12. We have known about infection-acquired immunity since the Athenian Plague in 430 BC, and the government questioning, denial and censoring of information about such natural immunity is a stunning denial of scientific facts during the pandemic. Unscientific and unethical vaccine mandates were one consequence of such censoring of me and other public health scientists. At a time when

vaccines were in short supply, we were vaccinating students and working-age adults with natural infection-acquired immunity, who did not need it, before many older high-risk Americans (including my 87-year-old neighbor), as well as millions of older people around the world in countries where vaccines were in short supply. If vaccines had been given to these older high-risk people, rather than on those who already had superior infection-acquired immunity, many lives could have been saved. Moreover, thousands of people (me included) with superior infection-acquired immunity were fired for not taking a vaccine they did not need, but which was desperately needed by others, with negative long-term consequences on their careers and finances.

13. From randomized trials, we know that the wearing of surgical and cloth masks has either no or minimal effect on Covid transmission. The Danish trial failed to show a statistically significant reduction while the Bangladesh study showed a reduction somewhere between 0% and 18%. This is important public health information so that people do not feel a false sense of security when wearing such masks, but such information was censored when provided by me and other scientists. As a consequence, many older people took unnecessary risks in crowded spaces such as restaurants, having been told that masks keep them safe, and some of them likely died because of it.

14. The major victim of Covid censoring is, by far, the public, and especially children and the elderly.

15. The censorship has also damaged and continues to damage me and my reputation as a scientist, because it conveys to others that I am not trustworthy with unorthodox pseudo-scientific views, even though I was censored for truthful statements in accordance with the basic principles of public health. It includes financial harm, as scientists depend on their scientific reputation to obtain grants and employment. Moreover, I am a single father, and family court attorneys in Connecticut are currently trying to use my '*unorthodox*' medical views to limit custody of my two eight-year-old children, Finn and Oona, for which I have shared legal and 50/50 equal time physical custody since before the

pandemic. Hence, the personal harm continues, as the government and the social media companies have not been held accountable.

16. In their brief dated October 8, 2024, the government attorneys state that I *'do not even attempt through new submissions to solve the problems the Supreme Court identified with their standing submissions'*. This was not because of a lack of argument, but because of time constraints. While attorneys are financially remunerated for their work on this case, I am not. I spoke the truth during the pandemic, I was censored for it, and my academic career and finances suffered because of it. It is very important to defend free speech, but as a single father, I must now focus on paid work to support my children.

17. Do we have freedom of speech because of the First Amendment, or do we have the First Amendment because freedom of speech is important to preserve society and life? When the Bill of Rights was written, Americans had lived through troubled times. They did not use that as an excuse for censorship. I think they understood that freedom of speech is especially important during difficult times when difficult decisions must be made.

I swear or affirm under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Martin Kulldorff", with a stylized flourish at the end.

Dated: October 28, 2024

Signed: /s/ Martin Kulldorff